

Date: October 16, 2007

Appl. No. : 09/930,115  
Applicant : SAMRA, et al.  
Filed : August 14, 2001  
Title : USER INTERFACE FOR A DIGITAL PRODUCTION SYSTEM  
INCLUDING MULTIPLE WINDOW VIEWING AND  
NAVIGATING  
TC/A.U. : 2672  
Examiner : BRIER, JEFFREY A  
Docket No. : 020699-004800US (50P4410.01)  
Conf. No. : 9996

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Commissioner for Patents  
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Alexandria, VA 22313-1450

In response to the Notification of non-Compliant Appeal Brief mailed  
September 26, 2007, Applicant respectfully resubmits this corrected Appeal Brief.

## **APPEAL BRIEF**

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### Real Party in Interest

The Real Party in Interest is SONY Corporation and SONY Electronics, Inc., the assignee of record.

### Related Appeals and Interference

There are no related appeals and interferences.

### Status of Claims

Claims 21-24 are pending in the present application. Claims 1-20 have been cancelled. Claims 21-24 are on appeal.

### Status of Amendments

Applicants have filed an amendment with this appeal brief. The amendments are to claims 22 and 23. The amendment was denied entry by the examiner.

### Summary of Claimed Subject Matter

Fig. 4A shows an embodiment of the claimed subject matter. In claims 21 and 24, a method for viewing an image on a display screen is provided. In Fig. 4A, a display screen 300 shows a flow graph that includes nodes. *See Specification*, page 12, par. 86. In claims 21 and 24, a navigator box is displayed. A navigator box 312 shows nodes that may be found off screen of display screen 300. *See Specification*, page 12, par. 87. In claims 21 and 24, an inner box is displayed. An inner box 314 shows the nodes displayed in display screen 300. In claims 21 and 24, a miniature version is displayed. Navigator box 312 shows a miniature representation of the flow graph. *See Specification*, page 12, par. 87. The nodes of the flow graph are connected using connectors. *See Specification*, page 12, par. 86. Not all of nodes in the flow graph are shown in display screen 300. In claims 21 and 24, displays of lines are omitted. As shown, the nodes in inner box 314 and navigator box 312 are not connected via the connectors shown connecting the nodes in display screen 300. *See Specification*, page 12, par. 87. Using inner box 314 and navigator box 312, the user can tell that a node is off screen and thus can scroll the display screen view upwards to bring in another node.

### Grounds of Rejection to be Reviewed on Appeal

1. Whether claims 22 and 23 are unpatentable under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter that applicants regard as the invention.

2. Whether claims 21-24 are unpatentable under 35 U.S.C. §103(a) over Hama et al (U.S. Patent No. 4,751,507, hereinafter “Hama”), in view of IBM technical disclosure bulletin and further in view of Mederer et al (U.S. Patent No. 5,864,782, hereinafter “Mederer”).



## Argument

### 1. Rejection under 35 U.S.C. §112

In an amendment after final, Applicants have amended claim 22 and 23 to correct the antecedent basis issues. Applicants submit that claims 22 and 23, as amended, fully comply with the requirements of §112. The amendment was denied entry by the Examiner in an advisory action of May 16, 2007. The advisory action stated the claim 22 appears to claim the same thing as claim 21. The term second set of nodes is the same term as recited in claim 21. The advisory action also states the limitation “is included” is unclear and states that the term “is included” implies that there are additional items in the navigator box such as the lines between the second set of nodes. Applicants traverse the response in the Advisory Action. The term include in claim 22 states that the second set of nodes is included in the offscreen image. The American Heritage dictionary defines the term included as:

1. To take in as a part, element, or member.
2. To contain as a secondary or subordinate element.
3. To consider with or place into a group, class, or total: *thanked the host for including us.*

Nowhere in that definition is it mentioned that included means additional items are included in the navigator box. Also, nowhere is the word included stated to mean there are lines between the second set of nodes. The element in claim 22 states the second set of nodes are included in the off-screen image.

The advisory action states that the changes to claim 23 imply interconnecting lines are displayed between the remaining nodes of the first and second nodes. Applicants traverse the rejection. Claim 23 recites omitting display of a line interconnecting a node in the first set of nodes and a node in the second set of nodes. Claim 21 states omitting display of lines interconnecting the plurality of nodes in the flowgraph displayed within the inner box and the navigator box. There is no implication in claim 23 that interconnecting lines are displayed between remaining nodes in the first

and second node. Claim 23 claims that between a node and another node, there are no interconnecting lines displayed. This is consistent with claim 21. Also, there is no new issue. Claim 23 recited omitting display of a line interconnecting at least one node and the outer node, which is consistent in number to claim 23, as amended.

Accordingly, applicants traverse the advisory action and request entry of the amendment.

24. Claim Rejections under 35 U.S.C. §103

Applicants submit that Hama, IBM technical disclosure bulletin, and Mederer, either alone or in combination, do not disclose or suggest every element of claims 21 and 24. For example, these references do not disclose or suggest omitting display of the lines interconnecting the plurality of nodes in the flowgraph displayed within the inner box and the navigator box while lines interconnecting the first set of nodes are displayed in the section of the display screen. As shown in Hama, Fig. 5, a part of an evergreen tree is shown in magnification in a box 23. A full screen picture that includes all screen images from box 23 shown in box 22. Further, in Mederer, Fig. 1, dots are shown in boxes 24 and 26 without lines. In Fig. 2 and Fig. 3, lines are shown interconnecting the dots.

Claims 21 and 24 both recite omitting display of the lines interconnecting the plurality of nodes in the flow graph displayed within the inner box and the navigator box while displaying the lines interconnecting the one or more nodes in the section of the display screen. The plurality of nodes includes a first set of nodes and a second set of nodes. The inner box displays the first set of nodes and the navigator box displays the second set of nodes. Taking the inner box and navigator box together, the plurality of nodes are displayed. However, the first set of nodes is displayed in the section of the display screen. The plurality of nodes shown in the inner box and navigator box do not have lines interconnecting them; however, the first set of nodes do have lines connecting them as shown in the display screen.

In the final office action mailed October 18, 2006, in the response to arguments section, the rejection stated that Mederer teaches displaying a large flow graph

in Fig. 1 and displaying a flow graph with nodes and lines “L” in Fig. 2, and also displaying a flow graph in a third way in Fig. 3. The rejection then states that Mederer suggests modifying Hama to display a flow graph displaying only nodes in a claimed inner box and a claimed navigator box because these display areas show many nodes in a small display area and to modify Hama to display the claimed section of the display with nodes and lines forming a portion of the flow graph because this display area shows a few nodes in a larger display area. Applicants note that nowhere in the response or rejection does the rejection address a situation where lines interconnecting the plurality of nodes in the flow graph are omitted within the inner box and the navigator box while lines interconnecting the first set of nodes are displayed in a section of the display screen. Rather, Mederer discloses three different and separate flow graphs one of which does not include lines interconnecting nodes and two of which include lines interconnecting nodes. Applicant notes that these are not even the same flow graph. Rather, these are different representations of plant parts.

Further, in the summary of the rejection of claim 21, nowhere does the rejection address omitting display lines when displaying nodes in a flow graph while lines interconnecting the first set of nodes are displayed in the section of the display screen. In Hama, the portion of the tree shown in box 23 is shown in box 25. The rest of the picture is shown in box 22. These are the same exact images and no changes are made other than the image shown in box 23 magnifies a portion of the image in box 22. In Mederer, three different graphs are displayed using different variables. These are not even the same graphs nor are they shown together. In claim 21, a portion of the image shown in the navigator box and inner box that is shown in the section of the display screen and has been changed (e.g., lines interconnecting the first set of nodes are included in the section of the display screen while being omitted in the inner box and navigator box). Hama, Mederer, and the IBM technical disclosure, do not disclose or suggest the concurrent display as claimed. Rather, Hama discloses the same image that is displayed in two different boxes, Mederer discloses three different graphs that are created separately, and the IBM technical disclosure just discloses one flow chart. Thus, the rejection has not addressed or shown any reference that discloses or suggests the subject

matter claimed in claim 21. Further, no mention of where the element is found is provided in the rejection. The rejection takes the elements piece by piece but does not address the omitting of interconnecting lines in the navigator box and inner box while displaying the interconnecting lines in the section of the display screen.

Further, Applicants do not see how generating three different graphs in Mederer can disclose or suggest omitting display of lines interconnecting the plurality of nodes while displaying lines interconnecting a first set of nodes in the display screen. Rather, Mederer suggests an all or nothing approach. Either nodes are displayed without any connecting lines or nodes are displayed with interconnecting lines. Nowhere in Mederer is it disclosed or suggested that the graph in Fig. 1 and the graph in Fig. 2 are displayed at the same time, and, even if they were displayed at the same time, they are not the same graph. Thus, Mederer still would not disclose or suggest omitting display of lines as claimed.

Accordingly, applicants respectfully request withdrawal of the rejection of claims 21 and 24. Claims 22 and 23 depend from claim 21 and thus derive patentability at least therefrom.

Respectfully submitted,

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## Claims Appendix

### **Listing of Claims:**

1-20. (Canceled)

21. (Previously presented) A method for viewing an image on a display screen, wherein the image includes a plurality of nodes in a flowgraph, wherein lines are used to interconnect a first set of nodes in the plurality of nodes that are displayed in a section of the display screen, wherein a portion of the image is displayed in the section of the display screen and wherein portions of the image are off-screen, the method comprising:

displaying a navigator box on the display screen, wherein the navigator box provides a miniature representation of a second set of nodes of the plurality of nodes;

displaying an inner box within the navigator box, wherein the inner box provides a miniature representation of the first set of nodes of the plurality of nodes in the flowgraph, wherein edges of the inner box correspond to edges of the display screen;

displaying a miniature version of the portion of the image on the display screen within the inner box in correspondence with the portion of the image's position with respect to the edges of the display screen, wherein the portions of the off-screen image are shown in miniature within the area of the navigator box that is outside of the inner box such that the first set of nodes and the second set of nodes display the plurality of nodes in the flowgraph in the navigator box and the inner box; and

omitting display of the lines interconnecting the plurality of nodes in the flowgraph displayed within the inner box and the navigator box while lines interconnecting the first set of nodes are displayed in the section of the display screen.

22. (Previously presented) The method of claim 21, wherein the plurality of nodes includes the at least one node and an outer node, wherein the outer node in the plurality of nodes is included in the off-screen image, wherein the outer node is shown within the area of the navigator box that is outside of the inner box.

23. (Previously presented) The method of claim 21, wherein omitting display of the lines interconnecting the plurality of nodes comprises omitting display of a line interconnecting the at least one node and the outer node.

24. (Previously presented) A method for viewing an image on a display screen, wherein the image includes a plurality of nodes in a flowgraph, wherein a portion of the image is displayed and wherein portions of the image are off-screen, wherein the plurality of nodes comprise one or more inner nodes and one or more outer nodes, wherein lines are used to interconnect one or more inner nodes of the plurality of nodes in a section of the display screen, the method comprising:

displaying a navigator box on the display screen;

displaying an inner box within the navigator box, wherein the inner box provides a miniature representation of one or more inner nodes of the plurality of nodes in the flowgraph, wherein the one or more inner nodes are in the portion of the image displayed, wherein edges of the inner box correspond to edges of the display screen;

displaying a miniature version of the portion of the image on the display screen within the inner box in correspondence with the portion of the image's position with respect to the edges of the display screen, wherein the portions of the off-screen image are shown in miniature within the area of the navigator box that is outside of the inner box, wherein the one or more outer nodes are in the portion of the off-screen image shown within the area of the navigator box that is outside of the inner box; and

omitting display of the lines interconnecting the plurality of nodes in the flowgraph displayed within the inner box and the navigator box while displaying the lines interconnecting the one or more inner nodes in the section of the display screen.

## Evidence Appendix

NONE

Related Proceedings Appendix

NONE